State Water Quality Management Resource Needs Model
Frequently Asked Questions

Prepared by The Cadmus Group, Inc
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General Questions

1. *How can States realistically project their needs?*

   A State should provide its data for each activity based on its NEEDS and not on its current allocation of hours or financial resources (unless, of course, the current allocation meets its needs). States should estimate the level of staffing and funding required to meet the objectives of the Clean Water Act in each program area. Participants in the development of the Resource Needs model found it helpful to keep in mind the following analogy to automobiles. States should provide estimates based on a "Chevrolet" approach to addressing Clean Water Act activities and not the "Yugo" approach which often occurs. Correspondingly, the estimates should not embrace “Cadillac” approaches which could result in external criticism of the Gap Analysis effort.

   We believe that State personnel are the best experts with the highest level of credibility on what it takes to run an adequate State water quality program.

2. *What is the goal of this effort? Will water quality management programs get more resources?*

   The goal of this effort is a credible estimate of the nationwide needs facing State water quality management programs. This estimate will be based on a framework developed by States with the assistance of EPA. In conjunction with a survey of current State expenditures, the results will provide a basis for the States and EPA to work together to address any shortfall.

3. *Will the estimate of national needs be credible if not all States participate?*

   The Association of State and Interstate Water Pollution Control Administrators (ASIWPCA) and the Environmental Council of States (ECOS) are encouraging every State to participate. If not all States return their needs data, a defensible methodology for extrapolating available State data will be developed. A description of this methodology will be provided with the final needs estimate. As the number of participating States increases, so will the accuracy and credibility of the national needs estimate.

4. *Is a users’ manual available?*

   Yes. The training presentations double as a users’ manual for the model. The PowerPoint presentations can be downloaded from the ASIWPCA web site (www.asiwpca.com) or obtained from ASIWPCA contact Jan Renfroe at j.renfroe@asiwpca.org or 512-494-8889. The Power Point files should be printed in “Notes Pages” form so that the slide narrative is included.

5. *The model seems to have places where double-counting can occur. How can double-counting be avoided?*

   The training sessions held in Dallas, Washington, D.C., and over the Internet were designed to give State personnel a good understanding of what should and should not be included in each module and in each activity within each module. Following the guidance provided at these sessions and in the users’ manual will help minimize double counting. The footnotes and the instructions in the model also contain warnings about double-counting. These warnings have been compiled into a "Reviewer's Checklist," which was distributed at State coordinator training sessions. State coordinators should screen modules as they are completed and communicate with program contacts to ensure that they have coordinated with their colleagues in other offices or agencies as necessary. This is especially important for modules such as Monitoring and Data Management that cut across many programs.

6. *Are modules completed by other States available to review?*

   Many States have already completed their resource needs analysis. If you would like more information, please contact Jan Renfroe of ASIWPCA (j.renfroe@asiwpca.org or 512-494-8889). The decision to share the results of a State's resource needs analysis rests with that State. EPA is developing a web site where participating States will be able to review each other's data.

7. *How can I estimate resource needs if my State does not have a certain type of program or activity yet?*

   If you are estimating needs for a program that your State has not yet assumed or implemented, you may wish to use the default values as benchmarks for your estimates (note Questions 9 and 10, below). It is important to remember, however, that the total costs for a program are not entirely covered in the module named for that program. Each program's data management and monitoring needs are covered in the Data Management and Monitoring modules. The default values in these modules reflect needs for all programs and thus may not help you with your estimate for a particular program. You may wish to contact other States for their estimates of need for these areas.

8. *How were the default values developed?*

   Five focus group meetings were held between June 1999 and February 2000. Focus group participants included State program managers and staff, EPA Regional and Headquarters staff, and other concerned stakeholders, notably the Association of State and Interstate Water Pollution Control Administrators (ASIWPCA) and the Environmental Council of States (ECOS).

   The focus group participants identified and defined the activities that they believed necessary to meet the objectives of the CWA within each water quality program area. Each program area became a "module" in the Resource Needs Model and each activity became a line-item, or a group of line items, within the module.

   The default values are based on the combined experience of the State water quality program personnel who attended the focus sessions. They represent the best estimates of focus group participants for the average amount of effort for an "average" State to meet the objectives of the CWA. The appropriate values will likely be higher or lower for your State and should, therefore, be reviewed carefully. Remember that the default values refer to needs and not to current expenditures.

9. *How does the model account for unique State programs?*

   Each module has a line item called "State-Specific Activities." If your State is involved in activities that contribute to Clean Water Act implementation and which are not included elsewhere in the model, you may estimate resource needs for those activities under this extra line item.

10. *How can a State account for differences in salaries among State employees in different program areas?*

Although you may not enter more than one number for your State's cost per FTE on the Main Menu worksheet, there are ways to account for differences in salaries among State employees. The most straightforward method would be to enter an *average* salary as the cost per FTE on the main menu. If the cost per FTE is much higher only for a particular program area or activity, you could enter additional "other costs" in the State-specific activity row for that module to account for higher salary costs.
Note: In the Nonpoint Source Model, you may change the cost per FTE for "Locally-Based Program/Project Coordination" under Footnote 8. The workgroup chose to include this feature because members believed there would be a large difference between the average salary received by State water quality management personnel, entered under General Assumptions, and the salary received by a locally-based project coordinator.

11. *Is there a way to print all the modules at once?*

    Yes. In the newest version of the Excel model (Version 4.0) you may print all the modules at once. Go to the "Tools" menu at the top of the screen and select "Macros". When the Macro box pops up, type "PrintModel" and click the "Run" button. If you downloaded the model from ASIWPCA's web site prior to December 10, you may not have the newest version of the model. (No substantive changes have been made, however). Please download the new version if you have not begun your data entry yet.

12. *Should the estimate for a "State-Specific Activity" include program planning and rule development for that activity?*

    Yes, you should try to include all efforts associated with the State-specific activity under the State-specific activity line item. If you cannot differentiate between planning and rule development for the State-specific activity and other planning and rule development, however, it will not be detrimental to the analysis of the bottom line numbers if you don't separate it out.

13. *How and to whom should States submit their data?*

    E-mail your data to Jan Renfroe at j.renfroe@asiwpca.org. If the file is too large for you to e-mail, you can save it to a disk(s) and mail it to Jan at 2210 Hartford Rd, Austin TX.

14. *When is the deadline for submitting State data?*

    The deadline for submitting State data is February 15, 2001. If your State is unable to meet this deadline, please submit your data as soon as possible after this date.

Point Source Assumptions Worksheet

1. *Under "Inventory of Septage Haulers and Land Application Sites," why are the cells for "Number of existing land application sites for biosolids" for Years 2 through 5 white (protected)?*

   The cells are protected because they contain a formula: the model automatically calculates the number of existing sites for future years based on your inputs for the next two rows, "Number of land application sites retired" and "Potential new/replacement land application sites." For example, the default value for existing sites in Year 2 is 1,150. This is the number of existing sites in Year 1 (1000) plus the number of potential new/replacement sites in Year 1 (250) minus the number of sites retired in Year 1 (100).

2. *Under "Inventory of Permitted Facilities," how can I provide for an anticipated decrease in future years?*

If you enter a negative percentage for future years, the model will calculate a decrease in the number of permits/facilities.

1. *Should renewals as well as new permits be included under the Inventory of State General Permits?*

   Yes, you should include the total number of each type of general permit that will need to be either issued or renewed over the five year period. Note that this number should reflect the number of general permits, NOT the number of facilities covered under general permits.

4. *Why is there a separate inventory for POTWs?*

   The data you enter in the separate POTWs inventory is used in the Compliance module in relation to performance compliance inspections and inspections of CSOs and SSOs.

5. *If local health departments regulate land application sites or septage haulers, should a State answer "Yes" to the Septage question?*

   If you expect your State to contribute financial resources to the local health departments or perform oversight or coordination activities, an estimate of these resource needs should be reflected in the model. You may answer "Yes" to the Septage question. You should carefully review the Septage module and adjust the default values to reflect your State's level of efforts. If you answer "No," the model automatically zeroes out the values in the Septage module.

6. *Does a plan that approves multiple sites for land application of biosolids count as one site in the model, or does the "Number of Sites" refer to the total number of individual sites?*

   The "Number of Sites" refers to the number of individual sites, not to the number of plans.

7. *Do the NPDES inventories for major and minor permits cover all facilities?*

   The NPDES inventory covers all facilities, both industrial and municipal.

Permitting Module

1. *Why is permit complexity addressed under "Permit Appeals" but not "Permit Issuance"?*

   The focus group believed that there would be greater variance among the resource needs for permit appeals for different permits than for permit issuance. If your State issues some permits that are much more complex than the average permit, you can include the efforts to issue those permits under Activity 6, "Extraordinary Permits." If you include a permit in the "Extraordinary Permits" line item, you should delete it from the inventory you entered on the Point Source Assumptions worksheet. Furthermore, you should include ALL resource needs for those permits (planning, issuance, renewal, and appeals) under "Extraordinary Permits" to prevent double counting of those resource needs in any other line items.

2. *Where can I include publication and travel costs for public notification?*

   Unlike most of the other modules, the Permitting module does not include an "Other Costs" column where States can enter non-personnel costs. An "Other Costs" column may be added in future versions of the model. If you believe the resource needs for publications and travel for public notification would be significant, you may wish to include them in your estimate of average cost per FTE.

3. *Does permit maintenance include entering data into PCS?*

   No. Your estimates for Activity 4, where you are directed to include the effort required for permit maintenance, should *not* include the effort required to enter data into PCS. PCS (or State equivalent) activities are covered in the Data Management module.

Compliance and Assistance Module

1. *What should be included in the "Other Costs" column?*

   You should include all non-personnel costs associated with compliance and assistance activities, such as travel and laboratory costs.

Nonpoint Source and Coastal Nonpoint Source Management Module

1. *Should State estimates include the nonpoint source management needs of non-water quality agencies?*

   Yes. If other agencies in your State undertake nonpoint source management activities that help meet the objectives of the Clean Water Act, you should include resource needs estimates for those activities.

2. *If the State expects to perform oversight activities for county-based land disturbance permitting, would those estimates be included in the NPS module?*

   Yes, your State's resource needs for oversight activities should be included in the model.

3. *Where can estimated non-personnel costs (e.g., for travel) be included?*

   Travel costs for field inspections and compliance assistance activities may be entered in the "Other Costs" column for Activity 4F. Other non-personnel costs may be included in the "Other Costs" column for Activity 10, "State-Specific Activities."

4. *Should estimated costs for technical assistance provided by other State agencies be included here?*

   If you expect other State agencies to provide technical assistance that is directly related to achieving the objectives of the CWA, you should include those efforts in your estimates. Please refer to Footnote 5 in the Nonpoint Source module for examples of the types of activities that should be included under Activity 4D, "Technical Assistance." You should not include implementation activities for nonpoint source projects.

5. *For Activity 6, "Locally-Based Program/Project Coordination," should I include the total number of counties in the State, or the number of counties where we actually have someone doing locally-based coordination?*

   You should include the number of counties or districts where you believe your State needs a staff person for locally-based coordination efforts in order to run an adequate nonpoint source management program. (Remember that you are trying to estimate resource needs rather than current expenditures.)

6. *Should estimated work associated with administration of the Section 319 grants be included in the Nonpoint Source Management module?*

   Coordination, tracking, and management of the State's Section 319 grant are included in the CWSRF and Other Grant Management module. The workload associated with the tracking and management of 319 funds passed through to local agencies for individual projects should be covered in the Nonpoint Source module under Activity 9, "Contract/Grant Coordination, Tracking, and Management."

7. *Where is work associated with the NPS Grant Reporting and Tracking System (GRTS) covered?*

   You may include work associated with GRTS under Activity 4B, "Watershed project planning and evaluation."

Total Maximum Daily Loads Development Module

1. *Do the TMDLs Development module default values reflect the requirement of the rule promulgated in July 2000?*

   The default values in the TMDLs development module reflect the requirements of the CWA as of February 2000. You should carefully review these values and adjust them to reflect your anticipated needs. You may add additional activities under the "State-Specific Activities" line item.

2. *On the TMDLs Instruction worksheet, how is the "total value of contracts" defined?*

   You should enter the total value of all contracts in a given year. For instance, if you have two contracts for $50,000 each, you would enter $100,000.

3. *Where should my State input resource needs for TMDL-specific monitoring?*

   All monitoring needs should be accounted for in the Monitoring module, even if they are specifically for TMDL development.

4. *Should I include the effort necessary to develop a TMDL monitoring strategy (not necessarily the monitoring itself) in Activity 3, "Analysis," or in the Monitoring module?*

   You may include the effort required to develop a TMDL monitoring strategy in Activity 3, which covers "identifying additional data needs" (see Footnote 3). If you would rather include this effort in Activity 3 of the Monitoring module, you may do so, but be sure to coordinate with your colleagues to avoid double-counting.

5. *Under Activity 6B, "Optional Public Outreach," to what does the add-on refer?*

   The add-on is set equal to a percentage of the total cost for Activities 1-5.

6. *My State develops TMDLs on a watershed basis, not for individual waterbodies. Can I enter a TMDL for a whole watershed as one TMDL?*

   Yes, you can enter a watershed as one TMDL, even if there is more than one waterbody in the watershed. As long as you capture the total need required to develop the watershed-based TMDL, you may enter the need however you prefer. The work group's intent in including the three levels of TMDLs was to give States ample flexibility in estimating their needs.

7. *Where can a State include the resource needs associated with working with EPA after the TMDL has been submitted but before it has been approved?*

   You should include the resource needs associated with working with EPA through TMDL approval. There is no specific line item for this activity in the current version of the model, but you may factor it into your per-TMDL estimates of effort for any of the line items, or include it as a State-Specific Activity.

8. *Where should the needs associated with developing and submitting the CWA §303(d) list and §305(b) report be included?*

   The monitoring efforts required to gather the data necessary to complete the 303(d) list and 305(b) report are covered in the Monitoring module. The effort required to compile the data, prepare the list and reports, and respond to public and EPA comments are covered in the Reporting and Planning module.

Wetlands Module

1. *Under Activity 6C, "CWA Section 401 water quality certification," should I enter the number of certifications or the number of applications?*

   Since the review of an application will require resources whether or not it is approved for certification, you should enter the total number of applications. (The Unit of Analysis for this activity will be changed to "Application" in the next version of the model.)

2. *Do I have to separate efforts associated with the compensatory mitigation program from the efforts associated with 404 permitting?*

   If it is easier for you to capture the efforts associated with your compensatory mitigation program under Activity 6A, "State has assumed CWA Section 404 program," you do not need to enter a separate estimate under Activity 6D, "Compensatory mitigation program." Be sure that you count your efforts for compensatory mitigation only once.

3. *Should the work of the Attorney General's office be included under Activity 8, "Administrative and Legal Appeals"?*

   If the Attorney General's office provides legal support that is directly associated with the State's wetlands program, you should include the office's efforts under Activity 8.

4. *If we refer enforcement matters to the Office of Enforcement, should their efforts be covered under Activity 7, "Surveillance and Enforcement of Permit Compliance"?*

   Yes. If the Office of Enforcement (or a similar office) deals with wetlands enforcement issues, you should include their efforts under Activity 7.

5. *Should the efforts of attorneys be captured under Activity 8, "Administrative and Legal Appeals"?*

   Yes, you should include attorneys' efforts under Activity 8. Some States have pointed out that costs for attorneys will likely be higher than the cost per FTE entered as a "General Assumption" on the Main Menu worksheet. To take this into account, you may wish to increase your general assumption for cost per FTE. (Please remember, however, that increasing the cost per FTE entered on the Main Menu will affect every module.)

6. *The effort to undertake a complaint investigation is sometimes intertwined with the response to that complaint (e.g., a NOV). Does this effort need to be included under the Enforcement module or can it be included here?*

   You may include the effort required to undertake a complaint investigation either in the Enforcement module or under Activity 7B, "Initial Response," as long as you coordinate with the individual completing the Enforcement module to prevent double counting.

Coastal and Marine Waters Module

1. *Is the Beaches Environmental Assessment and Coastal Health (BEACH) Act of 2000 covered in the module?*

   The BEACH Act requires States to adopt coastal water quality standards and notify the public when they are not being met. The Act also includes a grant to assist States in developing and implementing monitoring plans. The model was developed before Congress passed the BEACH act, so the default values do not necessarily reflect the resources needed to meet the Act's requirements. However, the model is flexible enough for you to include your estimates for meeting these requirements. You should consider the BEACH Act when estimating your State's needs for Activity 2, "Coastal Monitoring Program Management." The requirements of the BEACH Act may also affect your resource needs estimates for the Standards, Monitoring, Reporting, and Grant Management modules. Please coordinate with the individuals completing these modules to ensure that all needs are covered.

Monitoring Module

1. *Should capital investment in State labs and monitoring equipment be included in the Monitoring module? Where should it be included?*

   Yes, you should include capital investments for your State's monitoring program in the Monitoring module. You may include these costs in the "Other Costs" column for Activities 3-8, where appropriate. Remember that anything you enter into Year 1 will automatically carry forward to Years 2 through 5. Therefore, if you enter the need for a large capital investment in Year 1, you should access the worksheet for Year 2 and delete the cost for that year. If you annualize your capital investment costs, you need not take this precaution.

2. *Is ground water monitoring covered in the model?*

   If ground water monitoring is covered under your State's water quality program, you may include ground water monitoring needs under Activity 8, "State-Specific Activities."

3. *Is it possible to change the estimated number of samples for future years?*

   In the current version of the Excel model, the number of samples entered on the Monitoring Instructions worksheet carries through to Years 2 through 5. If you want to reflect increased monitoring activities in future years, you may add special studies for Years 2 through 5 on the Monitoring Instructions worksheet. Or, you may access the worksheets for Years 2 through 5 by pressing the "Yes" button at the bottom of each year's worksheet, and increase the "Other Costs" associated with each type of sampling. Future versions of the Excel model should allow you to change the estimated number of samples for each year.

4. *Does Activity 7, "External Support," cover agreements with USGS?*

   Yes, you should include the effort required to coordinate with USGS under Activity 7.

5. *What costs should be included for lab certification?*

   You should enter the costs for the State to certify labs, but do not enter the lab's monitoring costs or other costs incurred by the lab itself.

6. *Should/Can States include footnotes to explain what their "other costs" are?*

   States are not required to justify their estimates of resource needs for the national database, but you may want to keep a record of what you are including under "other costs" for your own State's purposes. If you are including an especially large non-personnel cost that you think may be questioned by other States, it may prove helpful to have notes on what your estimates include. Future versions of the model may include a feature that allows States to create footnotes for their entries if desired.

1. *Where should I include the effort required to write reports based on monitoring data?*

   The 305(b) report and the 303(d) list are covered in the Reporting and Planning module. Data processing using STORET (or the State equivalent) is covered in the Data Management module. If your monitoring staff writes reports for a particular program area (e.g., TMDLs), you may want to include this effort in the module associated with that program. If none of these options seems appropriate for your State, you may enter report writing as a State-Specific Activity.

Reporting and Planning Module

1. *Where can I include publication costs?*

   Unlike most of the other modules, the Reporting and Planning module does not include an "Other Costs" column where States can enter non-personnel costs. An "Other Costs" column may be added in future versions of the model. Currently, you may increase the percentage add-on for Activity 6, "Public Participation," to account for publication costs.

2. *Where can I include litigation costs?*

   Please avoid double-counting between the Reporting and Planning module and the TMDLs Development and Wetlands modules. The TMDLs Development and Wetlands modules each have a line item that specifically addresses legal challenges. If you wish to include litigation costs in the Reporting and Planning module, please see the answer to the Question 1 above. Litigation costs may be dealt with in a similar manner.

Data Management Module

1. *What is the default cost per square mile for GIS development and maintenance?*

   The default cost per square mile for GIS development and maintenance is $5.45/mi^2.

2. *Does the number of permits to be entered into PCS (or State equivalent) refer back to the total number of permits entered on the Point Source Assumptions page?*

   The number of permits refers to the total number of NPDES majors and minors entered on the Point Source Assumptions page. You may adjust this number as appropriate (e.g., to account for State-specific permits).